

EXHIBIT 2

1 UNITED STATES DISTRICT COURT
2 IN AND FOR THE DISTRICT OF WYOMING

3 -----
4 STEPHANIE WADSWORTH, Individually and
5 as Parent and Legal Guardian of W.W.,
6 K.W., G.W., and L.W., minor children,
7 and MATTHEW WADSWORTH,

8 Plaintiffs,

9 -against-

Case No.:
23-cv-00118-NDF

10 WALMART, INC. and JETSON ELECTRIC
11 BIKES, LLC,

12 Defendants.
13 -----

14 Thursday, November 16, 2023
15 9:46 a.m.

16 Deposition of JEFF SHEAMAN, taken by
17 Plaintiff, pursuant to Notice, held at The Hampton
18 Inn, 1055 Wild Horse Canyon Road, Green River,
19 Wyoming, before Denise Nowak, a Shorthand Reporter
20 and Notary Public within and for the State of Idaho,
21 appearing remotely.
22
23
24
25

1 Q. -- to determine that this was the
2 cause?

3 A. Yes.

4 Q. Okay. There was nothing suspicious
5 that you found within the home as having been
6 either criminal activity or malicious activity or
7 anything of that nature that started the fire?

8 A. No.

9 Q. You noticed that there was an outlet
10 that showed that something had been inserted into
11 the lower plug?

12 A. Yes.

13 Q. There was melted plastic covering the
14 lower plug holes, and wires were coming out of the
15 melted plastic. Do you see that in your report?

16 A. Yes. I remember writing that too. I
17 remember reading that too.

18 Q. And then in parenthesis, you put,
19 "This showed that something may have been plugged
20 into the outlet, maybe a charger." Do you see
21 that?

22 A. Yes.

23 Q. Okay. And let me see if I understand
24 that.

25 So are you saying that upon observing

1 this damage you identified an electrical plug?

2 A. Yes.

3 Q. That was plugged into an outlet?

4 A. There was an outlet, yes. And
5 then -- yes, something was plugged into the lower
6 portion of the outlet.

7 Q. Because what you saw was melted wire
8 and plastic coming from that outlet?

9 A. Yes.

10 Q. Obviously, because of the extent of
11 the fire damage, that wire would have been
12 severed --

13 A. Yes.

14 Q. -- at some point?

15 A. Yes.

16 Q. And you were not able to definitively
17 identify what it was that was actually plugged into
18 that outlet?

19 A. Correct. It was completely
20 destroyed.

21 Q. And that outlet was near the doorway?

22 A. Yes, it was.

23 Q. You stated -- and you continue that
24 you focused your attention near the floor close to
25 the entryway into the bedroom. This was just below

1 A. Yes.

2 Q. Even taking into consideration all of
3 the statements that you did from Mr. Pasborg, Mr.
4 Wadsworth, and the kids, correct?

5 A. Yes.

6 Q. And also taking into consideration
7 the lack of evidence that you -- that existed
8 outside of the home, right?

9 A. Correct.

10 Q. By the way, have you ever
11 investigated fires that have originated in a
12 plastic shed?

13 A. No, I have not.

14 Q. Did you ever learn from either Chief
15 Robinson, Chief Urgman or any other first responder
16 that when they arrived on the scene there was
17 something burning outside that window?

18 A. No, I don't remember anybody saying
19 anything about that. Again, I haven't watched the
20 body cameras or anything like that, but I don't
21 remember anybody telling me anything about a shed
22 outside.

23 Q. Okay. Do you have any knowledge or
24 understanding, from your education and your
25 training and your background, as to the

1 flammability of plastic?

2 MR. LaFLAMME: Object to form.

3 A. It will melt, not necessarily burn.

4 If it burns more likely it just -- it -- it melts,

5 plastic melts. So it's -- if a fire is set to

6 plastic, it will melt. It doesn't necessarily go

7 up in flames like a hollow core door or a piece of

8 wood or something like that. That's -- that's just

9 my take on that, my opinion on that.

10 BY MR. AYALA:

11 Q. All right. Do you have any
12 understanding or experience as to the rate at which
13 plastic melts?

14 MR. LaFLAMME: Object to form.

15 A. I'm --

16 MR. LaFLAMME: Go ahead.

17 A. -- not sure.

18 BY MR. AYALA:

19 Q. And the next portion, and this is at
20 the bottom of page 12 of your report, it's titled
21 Officers Actions and Observations. It describes
22 that on February 3rd you went to Walmart in Rock
23 Springs to research a little bit about the
24 hoverboard sold there?

25 A. Yes.

1 describe the locations of the window, the bed, the
2 closet, the outlet, the door.

3 Was your description of the locations
4 of those items in the bedroom consistent with the
5 information provided to you by Mr. Wadsworth?

6 A. Yes, it was.

7 Q. So you concluded those interviews.
8 You showed Matt some of the photographs, those were
9 the photographs that you had taken?

10 A. Yes.

11 Q. And that assisted you in
12 understanding where those items that he described
13 were located in the house before the fire?

14 A. Yes.

15 Q. And then Matthew and the children
16 left the building. That concluded your interview
17 of all of that, correct?

18 A. Right.

19 Q. Again, the audio and video recordings
20 from the interviews were download into the
21 electronic evidence by you, and the case was closed
22 pending further information, correct?

23 A. Right.

24 Q. Following March 4th, 2022, have you
25 receive or been provided with any additional

1 information relating to this fire incident?

2 A. No.

3 Q. Aside from -- putting this aside for
4 now, but aside from those hypotheticals that I
5 asked you about, a shed and smoking and a space
6 heater and arcing; and in all of those things,
7 you've not been provided with any additional
8 information relating to potential origin or cause
9 of this fire.

10 A. No, I have not.

11 Q. And even with all of those
12 hypotheticals and the information provided in those
13 hypotheticals, none of that changes your ultimate
14 conclusions that you've reached and pronounced
15 today.

16 A. No.

17 MR. LaFLAMME: Object to the form.

18 BY MR. AYALA:

19 Q. By the way, and we've referred to it
20 and you've described it a little bit earlier today,
21 did you find any arcing at all?

22 A. No, I don't believe there was any,
23 not that I noticed.

24 Q. Okay. But even still, as you
25 described earlier, any evidence of arcing, whether

1 of in passing, so.

2 Q. Okay. Would it be fair to say that
3 that conversation with Stephanie was more to see
4 how she was doing as opposed to investigating
5 further?

6 A. Yes. Yeah, if there was anything
7 that came out of that conversation that I thought
8 was relevant to the report, obviously I would have
9 probably brought her in at a later date, but she
10 was still healing, still in a lot of pain and
11 obviously it wasn't the time or the place, so.

12 Q. Okay. What -- what type of either
13 information or evidence would need to see to change
14 your ultimate conclusions as to the cause of this
15 fire?

16 MR. LaFLAMME: Object to form.

17 A. I don't think any evidence would --
18 would lead me to believe something else started
19 that fire. And it wasn't just based off what I
20 found. You know, if I go in on an investigation by
21 myself and I make an assumption or I have an idea
22 of what started this fire or who caused or
23 committed this crime or whatever, I'm open for
24 someone to come in and say, hey I found this or I
25 found that, or, you know, compare evidence so to

1 speak. But with three different investigators,
2 firefighters, law enforcement going in at separate
3 times and coming up with the same conclusion,
4 there's -- there's nothing that I don't think
5 anybody could show or give to me or any -- any
6 information that anybody could give to me to change
7 my mind.

8 MR. AYALA: Okay. Give me one quick
9 moment to look over some notes I had here and I
10 might be just about done.

11 THE WITNESS: Okay.

12 (Pause in proceedings.)

13 BY MR. AYALA:

14 Q. Did you ever review Chief Robinson's
15 report?

16 A. I did not; I sure didn't.

17 Q. Aside from the photographs that you
18 took, and you did review them earlier today, did
19 you review any other photographs taken by others?

20 A. No. I will say that there are other
21 photographs that -- and I cycled through the
22 photographs you guys provided me here. I know
23 there's more photographs because there are
24 photographs of the hoverboard --

25 Q. Right.

1 somebody needs a copy of a report or evidence or
2 that kind of stuff, so.

3 Q. And the first time that we've
4 discussed -- that you discussed news today,
5 correct?

6 A. Correct.

7 Q. Does the Sweetwater Sheriff's
8 Department have any specific written policies or
9 procedures as to the process to conduct an origin
10 and cause investigation?

11 A. Not necessarily, no. It's -- it's
12 just based off -- it's just basically how to handle
13 investigations and, you know, when to call a
14 detective, when not to, you know, that kind of
15 thing. So nothing specific though for origin and
16 cause investigation.

17 Q. Okay. And do you follow NFPA 921 for
18 your origin and cause investigations?

19 A. Yes.

20 Q. And that's what you would consider to
21 be the -- the guide that you would follow for your
22 process?

23 A. Yes.

24 Q. And is that what you try to follow
25 with respect to the law enforcement investigation?

1 A. Yes.

2 Q. And you understand your NFPA 921
3 describes the scientific method?

4 A. Yes.

5 Q. And the scientific method requires
6 you to assess all items, correct?

7 A. Correct.

8 Q. Okay. And I know that you did your
9 report, which has been marked as Exhibit 16, and
10 this report was completed. The last supplemental
11 was, I believe, March, March 4th of 2022, correct?

12 A. Correct.

13 Q. And any additional evidence that was
14 discovered on the private side, you're not aware of
15 that, right?

16 A. Correct.

17 Q. And you would agree that in order to
18 complete a full and thorough origin and cause
19 investigation under an NFPA 921, you would need to
20 consider all the evidence that's been uncovered,
21 correct?

22 A. Yes.

23 MR. AYALA: Object to the form.

24 BY MR. LaFLAMME:

25 Q. Did you take any video during your

1 on that. I don't want to go to the scene and
2 think, okay, it started in the shed because that's
3 what they thought. I want to get there, form my
4 own opinions about that, and then obviously go back
5 and compare that to the witness statements.

6 Q. This is from the same.

7 (Playing video recording.)

8 Q. And did you hear Kamille at about 10
9 minutes 42, 43 that the fire started outside on the
10 porch?

11 A. Yes.

12 Q. Okay. Going back 12 minutes 30
13 seconds.

14 (Playing video recording.)

15 Q. Stopped it at 13 minutes 18 seconds.
16 There do hear Mr. Pasborg indicate that it looked
17 like the fire started outside of the exterior wall,
18 correct?

19 A. Right.

20 Q. And then you also hear Detective
21 Merrill indicate that the kids felt that they it
22 started around the shed and that the parents smoked
23 in there, correct?

24 A. Yes.

25 Q. And Mr. Wadsworth had raised the

1 prospect of the shed being the potential cause, or
2 something in the shed being the potential cause
3 during your interview with him, correct?

4 A. Yes.

5 Q. Did you ever followup on that issue
6 with the shed --

7 A. With the shed --

8 Q. -- being the potential area of
9 origin?

10 A. No.

11 Q. One of the reasons you that you have
12 indicated that you found -- the area of the
13 hoverboard was located to be the area of origin was
14 related to V patterns, correct?

15 A. Correct.

16 Q. Okay. Was there anything else,
17 besides V patterns, that led you to the believe
18 that that was the area of origin?

19 A. Just the amount of damage, the amount
20 of charring, the amount of damage with the burned
21 away studs, that was the most damaged area of the
22 residence.

23 Q. Okay. Did -- you're aware that there
24 are times when a fire can start on the exterior of
25 a building and move to the interior.

1 injuries, correct?

2 A. Correct.

3 Q. Okay. So if the fire had started at
4 this hoverboard, and traveled to the window enough
5 to break the window before the kids -- before the
6 boys before woke up, that bed would have likely
7 caught fire, correct?

8 A. You would think so, yes.

9 Q. Okay.

10 MR. LaFLAMME: If you'd share this as
11 18A?

12 MR. CURRAN: Yes, sir.

13 MR. LaFLAMME: Thank you.

14 MR. CURRAN: I have it saved. I'll
15 get it uploaded here in a moment.

16 Do you still need the image shared?

17 MR. LaFLAMME: No, you can take it
18 down. Thank you.

19 MR. CURRAN: Thank you.

20 BY MR. LaFLAMME:

21 Q. When Mr. Wadsworth said that he was
22 concerned about the shed outside of the bedroom as
23 a potential area of origin, that isn't in your
24 report at all, is it?

25 A. No.

1 Q. Why wouldn't you have included that
2 in your report?

3 A. I think for the -- to be a hundred
4 percent honest, when I showed up on scene, there
5 wasn't anything that led me to believe initially
6 that the fire started on the outside, and I focused
7 my attention on the inside to where I believe the
8 fire started.

9 Q. And you're aware that when Mr.
10 Pasborg had arrived there was fire outside of the
11 house, correct?

12 A. I believe that's what he said, he saw
13 fire outside of the home.

14 Q. Okay. And if there was a shed there
15 that was used for smoking and that shed is the area
16 of origin, the fire could have traveled into the
17 boys bedroom through that window, correct?

18 MR. AYALA: Object to the form.

19 A. Potentially it depends on what -- I
20 would imagine whatever's inside that shed, whatever
21 the shed's built from, I mean obviously if it's
22 plastic, if it's, you know, wood, whatever is in
23 that shed, whatever the flammability of the
24 whatever the contents of that shed were to travel
25 up for that enough to break out that window and

1 A. That's something I would -- I would
2 definitely be all ears to talk to someone if
3 someone came to me. Again, I'm always bouncing
4 ideas off someone. If someone came to me and said,
5 hey, this is what we think, I would definitely look
6 into that; I would definitely consider, you know,
7 hey, let's -- let's take a second look at it. I've
8 done that with criminal investigations; I have no
9 problem with that. But again, it doesn't change my
10 opinion on where I believe the fire started.

11 Q. But you understand under NFPA 921,
12 that if additional evidence comes to light, you
13 need to consider that evidence, correct?

14 A. Correct.

15 Q. Okay.

16 A. And I wasn't -- I didn't hear of any
17 other, you know, any other calls, any other
18 evidence, or anything like that.

19 Q. Okay. I understood that you weren't
20 part of the private investigation --

21 A. Sure.

22 Q. -- and you haven't been privy of what
23 those results were, but if there was arcing that
24 was found in that shed, you would agree with me
25 that under 921 you would want to reevaluate your

1 house, this is what we found; something that might
2 spark an interest to look back into that, I would
3 be all over that, I would be very much for that.

4 But again, I still hold that opinion
5 of -- based off what I found, the firefighters
6 found, in discussing with them what they determined
7 what was the origin of cause, and it matched mine,
8 which is what I had said earlier.

9 BY MR. LaFLAMME:

10 Q. And your opinion is based on the
11 information you learned up through March 4th of
12 2022.

13 A. Yes.

14 Q. Okay. And even before then, you were
15 told about the smoking shed by Mr. Wadsworth,
16 correct?

17 A. Yes, yes.

18 Q. And that just wasn't anything that
19 you've followed up on at that time.

20 A. Correct.

21 Q. The fact that there -- there were
22 statements by the children about the fire starting
23 outside in the body camera footage cam, if there
24 was arcing that was found at the shed, that would
25 certainly cause you to look at that area as a

1 potential area of origin. True?

2 MR. AYALA: Form.

3 A. I would -- in that case, obviously
4 any additional information I got on something like
5 that I would look into it for sure.

6 Q. Okay. And with that type of
7 additional information, if that is the result of
8 the private investigation, Chief Robison indicated
9 yesterday that he would have -- as he was sitting
10 there yesterday, based, if that information was
11 true, he would have to put under NFPA 921 the
12 original as undetermined and his investigation as
13 ongoing.

14 Would that be the same qualification
15 you would use?

16 A. Yes.

17 Q. An as part of your investigation, you
18 went out to Walmart to look at the type of
19 hoverboard, correct?

20 A. Yes.

21 Q. Did you ever purchase an exempt -- an
22 exemplar?

23 A. No, I did not.

24 Q. Okay. I wasn't sure if you had.

25 A. Nope, I didn't.

1 A. Yeah.

2 Q. -- you don't know the background of
3 that --

4 A. No.

5 Q. -- correct?

6 A. No.

7 Q. Okay. Based on your investigation,
8 is it your belief that the hoverboard was -- the
9 hoverboard at the Wadsworth property was charging
10 at the time?

11 A. Yes.

12 Q. If it wasn't charging at the time,
13 would that have -- that would have caused you to
14 reevaluate your opinion, correct?

15 A. Again, again, potentially. You know,
16 I don't know enough about them to know if, you
17 know, if you -- maybe if unplug them, maybe if they
18 continue to be hot, if there's some kind of
19 malfunction or something inside of them, if they
20 could still catch fire, blow up, anything like
21 that, I honestly don't know, but.

22 Q. But your presumption was in your
23 investigation that it was plugged in --

24 A. Plugged in --

25 Q. -- correct?

1 questions.

2 There was nothing about this fire
3 that rendered you incapable of conducting a
4 thorough origin and cause investigation?

5 A. No.

6 Q. The body cam footage that you saw,
7 nothing from that body cam footage, that you were
8 shown today for the first time, affected and
9 impacted your opinion to the point of changing your
10 conclusions?

11 A. No.

12 Q. In fact it reinforced it.

13 A. It did, yes.

14 MR. AYALA: Sir, thank you.

15 THE WITNESS: You're welcome.

16 MR. LaFLAMME: Thank you.

17 EXAMINATION

18 BY MR. LaFLAMME:

19 Q. Detective sergeant, with respect to a
20 fire originating in Gunner and Layne's bedroom, you
21 would expect that circuit breaker to trip, correct?

22 MR. AYALA: Form.

23 A. In -- it's tied to the same circuit
24 breaker?

25 BY MR. LaFLAMME:

1 Q. Correct.

2 A. You -- probably more than likely,
3 yes.

4 Q. Okay. Generally, if a fire, wherever
5 the fire starts in the room of origin, that circuit
6 breaker for that room is going to trip --

7 A. Going to trip --

8 Q. -- correct?

9 A. -- yes.

10 (Inaudible, simultaneous talking.)

11 Q. You at least --

12 A. -- a lot of times I've, yes.

13 Q. -- you agree with that, correct?

14 A. I do.

15 Q. Did you look at the breaker box in
16 the basement?

17 A. I don't believe I did. If I did, I
18 probably would have photographed that. I don't
19 believe I did.

20 MR. LaFLAMME: Let me show you what
21 we'll mark as Exhibit 21.

22 (Whereupon, Exhibit 21 was marked for
23 identification.)

24 BY MR. LaFLAMME:

25 Q. Exhibit 21 is a photo of the breaker

1 Q. Okay. And do you recall that --

2 A. I do.

3 Q. -- kind of thing?

4 A. Yeah.

5 Q. And I think you agreed that it would
6 make sense for the fire to start at the hoverboard,
7 go up to the ceiling, come down the wall, and then
8 below out the window --

9 A. Yes.

10 Q. -- correct?

11 A. Yes.

12 Q. Okay. How would the boys get out of
13 the bedroom uninjured if that happened?

14 A. The that's a good question. And
15 that's one I can't answer.

16 I know that based off their testimony
17 saying they felt heat, they saw flames. I don't
18 know how intense -- if it did start there at that
19 hoverboard. I don't know how intense that flame
20 was at that point, and that's what make me question
21 if that window was actually broke out or open at
22 that point, because it sure wouldn't be open in
23 February. If that fire had already reached to the
24 point where it broke the window, it's hard to
25 believe that they would escape without injury.

1 Q. And Gunner said, in your interview
2 with him on March 4 2022, by the time I woke up
3 there was no window, correct?

4 A. Yes, I remember him saying that.

5 Q. Do you recall him saying that?

6 A. I do.

7 Q. All right. The kids never
8 indicated -- Gunner and Layne never indicated that
9 they heard any popping noises, correct?

10 A. Right.

11 Q. Have you ever seen a -- or heard a
12 lithium ion battery pack fail?

13 A. I have not.

14 Q. All right. You don't know what noise
15 it makes?

16 A. I mean if you watch like a YouTube
17 video like the YouTube video I watched, but really
18 I don't remember if it's like a popping noise or
19 anything like that, so.

20 Q. Okay. You are aware it at least
21 makes a noise?

22 A. Oh yeah.

23 Q. And popping is probably the best type
24 of description for it --

25 A. Yes.

1 A. I would imagine, let's put it that
2 way.

3 Q. And a there's no indication that the
4 boys heard a pop, pop type noise?

5 A. No.

6 Q. You were asked a question as to
7 whether it is possible have to have arcing outside
8 if the fire traveled from the inside of the
9 building to the outside of the shed. Do you recall
10 that?

11 A. Yes, I do.

12 Q. Okay. If that happened, you would
13 have a tripped circuit breaker for that bedroom,
14 correct?

15 MR. AYALA: Form.

16 A. That I -- I don't know about that;
17 I'm not sure. I -- I think -- I know with fires
18 anything can happen anything, anything is possible,
19 but I don't know if I can answer that real well.

20 Q. Okay, fair enough. You would agree
21 that as an origin and cause investigator it's
22 important to be at the site to -- to process the
23 site, correct?

24 A. Yes.

25 Q. And as an origin and cause

1 investigator, you would want to be part of the
2 processing of the scene, correct?

3 A. Yes, for sure.

4 Q. And in order to come to a final
5 opinion, you would want to be involved in the final
6 processing of the scene, correct?

7 MR. AYALA: Form.

8 A. Umm, by final you mean -- I mean I
9 was there with -- when, when both chiefs and I were
10 there during that day. I was confident, by the
11 time we left, we had an idea of what had happened
12 there.

13 I'm not sure how to answer your
14 question.

15 BY MR. LaFLAMME:

16 Q. Okay. In order to come to a final
17 conclusion as to what you're going to state was the
18 cause of the fire, you would want to be involved in
19 all of the scene processing activities, correct?

20 A. Yes.

21 Q. If you were an origin and cause
22 expert and you were just brought in after the scene
23 was already gone, you would agree that that creates
24 some difficulty, correct?

25 A. Yes, it would.

1 much more, but I would probably go over if you are
2 right on the edge.

3 THE VIDEOGRAPHER: Yeah, I'm like
4 three minutes.

5 MR. LaFLAMME: Okay, yeah. I -- I
6 probably don't have any more than five to eight
7 minutes, but why don't we change it.

8 THE VIDEOGRAPHER: Thank you.

9 This is the end of Media Unit number
10 5. We are off the record at 5:25 p.m.

11 (Recess taken.)

12 THE VIDEOGRAPHER: This is the
13 beginning of Media Unit number 6. We are on the
14 record at 5:28 p.m.

15 BY MR. LaFLAMME:

16 Q. Detective sergeant, thanks for --

17 A. Sure --

18 Q. -- the interruption.

19 A. -- that's okay.

20 Q. You're aware that, in the interviews
21 that you had with Gunner and Layne, that -- that
22 Gunner described that the fire was behind him,
23 correct?

24 A. Yes.

25 Q. That he said it moved up the wall and

1 melted through the window, correct?

2 A. Yes.

3 Q. Okay. And that Layne said there was
4 a giant shed in that area, correct?

5 A. I believe so, yes. That's on my
6 report.

7 Q. Okay.

8 A. I believe so, yes.

9 Q. And then you asked Gunner where was
10 the fire in the room, and Gunner said it was by the
11 window, correct?

12 A. I remember that, yes.

13 Q. Okay. Gunner and Layne never said
14 that they saw fire at the hoverboard, correct?

15 A. I don't -- I don't remember if they
16 did or not; I don't believe so though.

17 Q. One of them said that they saw it --
18 ash by the hoverboard, but they never said they saw
19 fire at the hoverboard, correct?

20 A. I believe that's correct.

21 Q. At the conclusion of your
22 investigation on -- in March of 2022, at the point
23 in time you didn't know about the body cam
24 statements immediately after the fire, correct?

25 A. Correct.

1 Q. And you didn't know much about the
2 shed, other than Matthew Wadsworth's kind of
3 passing statement at the end of his interview,
4 correct?

5 A. Correct.

6 Q. And you didn't know what was in the
7 shed, correct?

8 A. Right.

9 Q. You didn't know that the Wadsworths
10 smoked in the shed, correct?

11 A. He had told me that, but I -- I
12 didn't recall.

13 Q. And you didn't follow up on that,
14 correct?

15 A. No.

16 Q. And you didn't know that there was a
17 space heater in the shed?

18 A. No. Again, I -- he told me that and
19 I -- I guess I figured it out.

20 Q. Okay. You didn't know that there was
21 no tripped breaker for the bedroom where you put
22 the area of origin, correct?

23 MR. AYALA: Form.

24 A. Right.

25 BY MR. LaFLAMME:

1 Q. You didn't know that there was no
2 arcing found in that bedroom, correct?

3 A. Correct -- umm, in the bedroom?

4 Q. Correct.

5 A. Correct.

6 Q. And there was -- you didn't know that
7 there was no arcing found anywhere in the house,
8 correct?

9 A. Correct.

10 Q. And you didn't know, in March of
11 2022, that there was arcing found in the shed
12 outside, correct?

13 MR. AYALA: Form.

14 A. Correct.

15 BY MR. LaFLAMME:

16 Q. All of that information, if that
17 bears out in evidence, that was all information
18 that you did not have when you wrote your report in
19 March of 2022, correct?

20 A. Right.

21 MR. LaFLAMME: All right.

22 That's all the questions I have.

23 Thank you.

24 THE WITNESS: Thank you.

25 MR. AYALA: Okay.